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Attorneys for Plaintiff
XPOSURE PHOTO AGENCY INC.

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

XPOSURE PHOTO AGENCY INC.,

Plaintiff,

v.

CHRISTOPHER BROWN,

Defendant.

Case No.: 2:23-cv-10103-MRA (AGRx)

Hon. Mónica Ramírez Almadani

**PLAINTIFF'S RESPONSE TO
ORDER TO SHOW CAUSE**

Plaintiff Xposure Photo Agency Inc. responds to the Court's Order to Show Cause re Dismissal for Lack of Prosecution (ECF 19) as follows. The facts below are within the personal knowledge of undersigned counsel and are declared under penalty of perjury.

1. I filed the complaint in this action on November 30, 2023 (ECF 1). Shortly thereafter, the clerk issued a summons (ECF 9).

2. In January 2024, I engaged the services of a process server to serve the summons and complaint on the defendant, a well-known musical artist, at a Tarzana address where, according to my research, defendant lived.

3. On January 30, 2024, the process server informed me that it had effected valid and proper service on defendant at the Tarzana address.

1 4. I filed the proof of service (ECF 16) and the Request for Entry of Default
2 (ECF 17) on March 27, 2024.

3 5. On April 23, 2024, I received an email from Matthew Kamen, a lawyer
4 who informed me that he and his firm represent Mr. Brown. I have since engaged
5 with Mr. Kamen about the possibility of resolving this dispute. According to Mr.
6 Kamen, Mr. Brown is in rehearsals, thus delaying his responses, sometimes
7 significantly. Nevertheless, I believe there is a reasonable chance for a resolution.

8 6. Plaintiff respectfully requests that the Court discharge the OSC and, to
9 allow time for the parties to continue their discussions, set a deadline 45 days out for
10 the filing of a motion for default judgment or a motion to set aside the entry of default.

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12 Dated: May 14, 2022

Respectfully submitted,

PERKOWSKI LEGAL, PC

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15 By: /s/ Peter Perkowski

Peter E. Perkowski

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17 Attorneys for Plaintiff
XPOSURE PHOTO AGENCY INC.
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